

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: ANGENITA SMITH

CHAPTER 13
CASE NO. 21-01696 JAW

OBJECTION TO PROOF OF CLAIM

COMES NOW Debtor, ANGENITA SMITH, through counsel and files her
Objection to Proof of Claim filed by NS193, LLC on behalf of Statebridge Company,
LLC (Claim #4-1) and in support of same would show unto the Court the following:

I.

That, Debtor filed a voluntary Chapter 13 Petition on October 11, 2021.

II.

That, NS193, LLC on behalf of Statebridge Company, LLC filed a proof of claim
(#4-1) on December 20, 2021 alleging that debtor owes \$82,011.57, and arrearage in
the amount of \$50,279.50. **See Exhibit A** attached hereto.

III.

Debtor disputes this proof of claim because she contends that NS193, LLC on
behalf of Statebridge Company, LLC's Proof of Claim (#4-1) does not show clearly who
owns the loan. Statebridge Company attached an "Affidavit of Lost Note" to the proof of
claim which was executed by Nationstar Mortgage LLC. According to the documents
presented, it is not clear, if at all, whether Nationstar serviced or owned debtor's loan

IV.

Debtor dispute this claim for the above reasons, so therefore, this claim should be
denied.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this be received and

the Proof of Claim (#4-1) filed by NS193, LLC on behalf of Statebridge Company, LLC. be denied and that Debtor be granted any and all general relief that she may be entitled to.

Respectfully submitted,

ANGENITA SMITH

BY: /s/ THANDI WADE
THANDI WADE

TATUM & WADE, PLLC
POST OFFICE BOX 22688
JACKSON, MS 39225-2688
(601) 948-7770
STATE BAR NO. 10464

CERTIFICATE OF SERVICE

I, THANDI WADE, do hereby certify that I have this day mailed, via electronic mail and United States Mail, postage pre-paid, a true and correct copy of the above and foregoing Objection to Proof of Claim (#1-1) to the following:

Office of the U S Trustee
Ustregion05.ja.ecf@usdoj.gov

Hon. James L. Henley, Jr.
Chapter 13 Trustee
jihenley@jihenleych13.net

Statebridge
In care of NS193, LLC
6061 S. Willow Dr. Suite 300
Englewood CO 80111

MCalla Raymer Leibert
1022 Highland Colony
Pkw, Suite 304
Ridgeland, MS 39157

Angenita Smith
6547 Goldfield Street
North Las Vegas, NV 89084

THIS the 18th day of January, 2022.

/s/ THANDI WADE
THANDI WADE